

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

DATE:

MAR 25 1994

SUBJECT: U.S.S. Lead Refinery, Inc.  
IND 047 030 226

FROM: Joseph M. Boyle, Chief  
RCRA Enforcement Branch

TO: Charles Orzechoskie, Chief  
Wetlands Regulatory Unit

As discussed in a recent meeting between Day Waterman, Thad Slaughter, Diane Sharrow, and Mirtha Capiro of our respective staffs, I am requesting assistance from your program in evaluating the compliance of U.S.S. Lead Refinery, Inc. (U.S.S. Lead) with the requirements of a November 18, 1993, Administrative Order on Consent (Order) issued under the jurisdiction of the Resource Conservation and Recovery Act. The need for this request is based on information that approximately 54 acres of wetland exist on the southern portion of the facility adjacent to the Grand Calumet River. The Order issued requires the submission and implementation by U.S.S. Lead of (a) an Interim Stabilization Workplan and Report along with a proposal for a Corrective Action Management Unit, and (b) a Modified RCRA Facility Investigation (MRFI) Workplan and Report. The wetlands are contained in the contaminated area being addressed by the activities under the Order.

Expertise is requested to assist the REB Ecologist and the U.S. F&WS, in review of documents submitted by or related to U.S.S. Lead under the Order. Specifically, wetland expertise is required for (a) evaluating the full impact of the ISM and MRFI activities on wetlands at or near the facility, (b) determining wetland restoration potential and proposing appropriate restoration measures, and (c) providing early involvement in the review of any United States Corp of Engineers permit(s) for regulated activities (e.g., dredging, placement of fill) that may be conducted in connection with the activities under the Order.

The anticipated time frame for completion of ISM activities and submittal of ISM Report is 2 years. U.S.S. Lead is required to submit its MRFI workplan within sixty (60) days of approval of the ISM Report. Therefore, additional time would be required for completion of the MRFI activities and submittal of MRFI Report.

If you have any questions, please contact Mirtha Capiro, of my staff, at 6-7567.

bcc: Diane Sharrow